



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
**NOTICE OF VIOLATION**

VIOLATION NUMBER

12311SW

DATE AND TIME ISSUED

11/16/2007

SOURCE (NAME, ADDRESS, PERMIT NUMBER, LOCATION)

City of Rockaway Beach WWTF

1000 Boys Camp Road

Missouri State Operating Permit (MSOP) #MO-0108162

SE1/4, SE1/4, Sec.11, T23N, R21W, Taney County

MAILING ADDRESS

P.O. Box 315

CITY

Rockaway Beach

STATE

MO

ZIP CODE

65740

NAME OF OWNER OR MANAGER

Larry Cline

TITLE OF OWNER OR MANAGER

Mayor

LAW, REGULATION OR PERMIT VIOLATED

Missouri Clean Water Law Sections 6440.051.(3) and 644.076.1, RSMO  
Missouri State Operating Permit #MO-0108162

NATURE OF VIOLATION

DATE(S):

TIME(S):

The City of Rockaway Beach falsified Discharge Monitoring Reports.  
The City of Rockaway Beach failed to comply with the effluent limitations contained in Missouri State Operating Permit MO-0108162 (MSOP).  
The City of Rockaway Beach failed to properly operate and maintain the wastewater treatment facility.  
The City of Rockaway Beach failed to collect 24-hour composite samples in accordance with the city's MSOP.

SIGNATURE (PERSON RECEIVING NOTICE)

Sent Via US Mail

SIGNATURE (PERSON ISSUING NOTICE)

Gregory Perkins

TITLE OR POSITION

TITLE OR POSITION

Environmental Engineer/SWRO

DISTRIBUTION: SOURCE CENTRAL OFFICE REGIONAL OFFICE



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
REPORT ON INSPECTION  
WASTEWATER TREATMENT FACILITY SERVING  
CITY OF ROCKAWAY BEACH  
MISSOURI STATE OPERATING PERMIT MO-0108162  
TANEY COUNTY, MISSOURI

November 16, 2007

INTRODUCTION

On September 26-27, 2007, Gregory S. Perkins, P.E. of the Missouri Department of Natural Resources – Southwest Regional Office conducted a routine inspection of the wastewater treatment facility serving the City of Rockaway Beach. The purpose of the inspection was to assess compliance with the Missouri Clean Water Law, Missouri Clean Water Commission (MCWC) regulations and the facility's Missouri State Operating Permit (MSOP). The inspection also served to promote proper operation and to provide technical assistance where necessary.

WASTEWATER TREATMENT FACILITY DESCRIPTION

The facility operates under MSOP number MO-0108162 which expires on August 29, 2011. The treatment facility outfall 001 is composed of an influent pump station, an influent structure with screening, an anoxic-anaerobic selector basin, two aeration basins with aeration being provided by three blowers and two motive pumps per basin, two secondary clarifiers, tertiary filtration, ultraviolet disinfection, and sludge holding and thickening facilities. The system has a Design Flow capacity of 0.6 million gallons per day. Sludge is retained in the sludge holding basin until disposal by land application. The facility discharges to Lake Taneycomo which is Class L2, 303(d) stream. The facility has a Design Population Equivalent of 6,000.

COMPLIANCE EVALUATION

1. Information was provided to this office from the Environmental Protection Agency, Region VII that indicates the City of Rockaway Beach that indicates the City of Rockaway Beach for some period of time has been falsifying Discharge Monitoring Reports. This constitutes a violation of Missouri Clean Water Law Section 644.076.2, RSMo, for which Notice of Violation # 12311SW is being issued.
2. Please find enclosed a copy of the Results of Sample Analysis for samples obtained during the inspection. The results indicate the facility was in non-compliance with MSOP limitations for Non-Filterable Residue.

3. There were many pieces of equipment which were not operational or were providing marginal operation. This includes but is not limited to anaerobic/anoxic basin mixers, three of five motive pumps (aeration equipment), both backwashing pumps, and the ultra-violet disinfection system although the sample results indicate compliance. The City of Rockaway Beach has failed to properly operate and maintain the wastewater treatment facility.
4. The City of Rockaway Beach is not maintaining records of sample collection and analysis as required by MSOP Standard Condition Part I, Section A, item 5.a.
5. The City of Rockaway Beach is not collecting 24-hour composite samples as required by the MSOP.

#### OPERATION AND MAINTENANCE EVALUATION

6. The dissolved oxygen meter was out of service.
7. It is unknown if the pH meter is working correctly as it could not be calibrated.
8. The wastewater treatment facility does not have a certified thermometer to check temperatures.
9. The mixers in the west anoxic-anaerobic basin would not function properly.
10. Three out of five motive pumps were out of service.
11. The influent flow meter had not been certified by a factory authorized representative.
12. The sand filtration backwash pumps were out of service.
13. The ultra-violet light disinfection system was not in complete operation.

#### COMMENTS

Information was provided to this office from the Environmental Protection Agency, Region VII that indicates the City of Rockaway Beach that indicates the City of Rockaway Beach for some period of time has been falsifying Discharge Monitoring Reports. This constitutes a violation of Missouri Clean Water Law Section 644.076.2, RSMo, for which Notice of Violation #12311SW is being issued. The City of Rockaway Beach must begin providing accurate Discharge Monitoring Reports and maintaining records that will document all sample analysis in accordance with the Missouri State Operating Permit Standard Conditions Part I, Section A, item 5.a.

Please find enclosed a copy of the Results of Sample Analysis for samples obtained during the inspection. The results indicate the facility was in non-compliance with Missouri State Operating Permit limitations for Non-Filterable Residue. This constitutes a violation of Missouri Clean Water Law Sections 6440.051.(3) and 644.076.1, RSMO for which Notice of Violation #12311SW is also being issued.

There were many pieces of equipment which were not operational or were providing marginal operation. This includes but is not limited to anaerobic/anoxic basin mixers, three of five motive pumps (aeration equipment), both backwashing pumps, and the ultra-violet disinfection system although the sample results indicate compliance. The City of Rockaway Beach has failed to properly operate and maintain the wastewater treatment facility. Failure to properly operate and maintain the facility constitutes a violation of Missouri Clean Water Law Sections 644.051.1(3) and 644.076.1, RSMo for which Notice of Violation #12311SW is also being issued. The City of Rockaway Beach must develop a preventative maintenance plan and schedule for all wastewater treatment facility equipment.

The City of Rockaway Beach is not collecting 24-hour composite samples on the effluent as required by the MSOP. The City of Rockaway Beach must obtain 24-hour composite sampler to obtain the effluent compliance samples. It is also recommended the City of Rockaway Beach obtain 24-hour composite samplers to monitor the combined influent sewage and one for each community, Bull Creek Village and Merriam Woods.

The City of Rockaway Beach is not maintaining records of sample collection and analysis as required by MSOP Standard Condition Part I, Section A, item 5.a. Every sample that is collected whether for operational testing or compliance monitoring must have the information.

It was noted that the dissolved oxygen meter was out of service during the inspection. It is recommended that the dissolved oxygen meter be repaired or replaced. It has been noted that the City of Rockaway Beach has since the inspection received a new dissolved oxygen meter but the Biochemical Oxygen Demand probe has not been delivered at this time.

It is unknown whether the pH meter is operational. Efforts were made during the inspection and subsequent visits to calibrate the pH meter which were unsuccessful. Since pH is to be analyzed immediately, the pH meter must be evaluated to ensure its proper operation or the meter must be repaired or replaced.

The laboratory has no certified thermometer to monitor the temperature of laboratory equipment. The "Standard Methods for the Examination of Water and Wastewater, 21<sup>st</sup> Addition" outlines acceptable range of temperatures for analysis. The thermometer checks the temperatures of the equipment to ensure the proper analytical techniques. A log should be kept for each piece of laboratory equipment which temperatures must be maintained in ink with the date, time, results, and signature or initials of person checking the temperatures.

As a reminder, all laboratory bench sheets including pH must contain all the information required by the MSOP Standard Condition Part I, Section 5a. Copies of the Standard Conditions are attached outlining the information which must be included for all sampling and analysis to be completed by the City of Rockaway Beach or contract laboratory.

The influent flow measuring device had not been recently certified by a factory authorized representative. It is recommended that all flow meters be certified annually. This is to ensure proper indicating, totalizing, and recording of flows entering the wastewater treatment facilities. This information is necessary for evaluating current hydraulic loading to the facility.

We are unsure if the laboratory has a set of ASTM Class I weights to check the accuracy of analytical balance. The City of Rockaway Beach must either purchase a minimum of three ASTM Class I weights in the range of weights routinely measured or have the factory authorized representative certify the existing weights, if there are those type of weights, meet the ASTM Class I requirements.

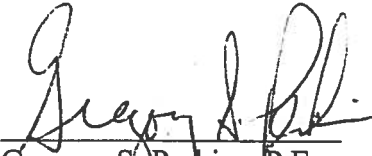
#### RECOMMENDATIONS

1. Continue with efforts to maintain compliance with all MSOP permit limits and conditions.
2. Provide accurate Discharge Monitoring Reports.
3. Include the required information outlined in MSOP Standard Conditions Part I, Section 5a for all sample collection, analysis, and quality assurance testing.
4. Ensure all wastewater treatment equipment is operational and is maintained. Prepare a preventative maintenance plan and schedule for all equipment.
5. The City of Rockaway Beach must collect 24-hour composite samples for effluent analysis.
6. Provide 24-hour composite samplers for the combined influent and each individual community.
7. Repair or replace the laboratory dissolved oxygen meter. Provide dissolved oxygen meters for operation staff.
8. Repair or replace the pH meter and conduct all quality assurance analysis.
9. Conduct calibration and quality control procedures for all laboratory analysis.

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City of Rockaway Beach  
November 16, 2007  
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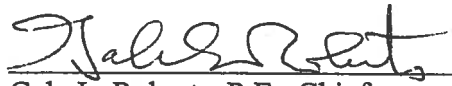
10. Provide a certified thermometer to monitor temperatures in laboratory equipment in which temperature is critical to the analytical procedure.
11. Provide a minimum of three ASTM Class I weights in the range of weights measured or have the factory authorized representative certify any existing weights.
12. Repair or replace all inoperative equipment.
13. Provide yearly certification of all flow measurement devices by a factory authorized representative.
14. Repair or replace all inoperative ultra-violet disinfection bulbs.

REPORTED BY:



Gregory S. Perkins, P.E.  
Environmental Engineer  
Southwest Regional Office

APPROVED BY:



Gale L. Roberts, P.E., Chief  
Water Pollution Engineering Unit  
Southwest Regional Office

